

National Transport Commission
Level 3, 600 Bourke Street
Melbourne, VIC 3000

Submission: A risk-based approach to regulating heavy vehicles

NTC ACKNOWLEDGED PROBLEMS WITH THE HVNL

"Over half of Australia (by area) has not applied the HVNL"



figure 11 NTC Issues Paper - A risk-based approach to regulating heavy vehicles

"Heavy vehicles are used for diverse purposes by a wide range of operators. Heavy vehicles travel in vastly different domains in Australia. The law does not deal well with the diversity"

"The HVNL is not risk-based and contains inconsistent rules and regulations disproportionate to the risks it seeks to manage"

"Although the HVNL has been in operation for some years, it has not fully achieved its original goals in reducing regulatory burden, and productivity and safety improvements have been mixed"

***I SUBMIT THAT WE REPEAL THE LAW, TAKE A "RISK BASED APPROACH" AND INTRODUCE
A FAIR-DINKUM AND SPECIFIC TRUCKING INDUSTRY MASTER CODE OF PRACTICE***

Without WA & NT the law, in whatever revised form, cannot be national and therefore it should be repealed.

Just scrap the HVNL and replace it with an **easy to read and mandatory** Master Code of Practice.

The Master Code should only apply to the Trucking Industry, that is road freight tasks including oversize/overmass, interstate line haul, urban distribution, livestock movements, refrigerated transport, dangerous goods etc. It should not apply to other heavy vehicles such as cranes, agricultural vehicles, fire trucks, concrete pumps, buses etc.

The Master Code (or *Australian Truck Rules*) could run alongside *Australian Road Rules* and *Australian Design Rules*.

This will allow speeding & fatigue, being safety issues that apply to all road users to be covered by *Australian Road Rules*.

Vehicle design, componentry and maintenance standards to be covered by *Australian Design Rules*, which can mandate safety equipment like black boxes, GPS trackers, driverless technologies etc. and facilitate compatibility for their adoption into all road vehicles.

Australian Truck Rules will focus primarily on safety and productivity issues associated with mass, dimension and loading

Yours Sincerely



Shane Jeffrey
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